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Hon. William J. Martini, U.S.D.J.
United States District Court
District of New Jersey
Martin Luther King Jr. Building & U.S. Courthouse
50 Walnut Street – Room 4076
Newark, N.J. 07101

February 12, 2021

Re: Wyckoff Properties, LP, et al. v. Selective Insurance Co., et al.
U.S.D.C., D.N.J., No. 2:21-cv-00238-WJM-MF

**JOINT REQUEST TO ADJOURN ZURICH'S MOTION TO DISMISS
ONE CYCLE AND MAKE IT RETURNABLE ON MARCH 15, 2021**

Dear Judge Martini:

My office represents the Plaintiffs in the above-referenced insurance-coverage declaratory judgment action.

Zurich recently filed a motion to dismiss the claims of Taste Buds LLC, the only plaintiff in this action which is making a claim against Zurich. The Motion Day for Zurich's motion to dismiss is March 1, 2021. In addition, Plaintiffs have filed a motion to remand. The Motion Day for Plaintiffs' motion to remand is March 15, 2021.

Zurich has agreed to adjourn its motion one cycle. Adjourning the Zurich motion to March 15, 2021 would require Opposition Papers to be due on March 1, and Reply Papers would be due on March 8, according to the Court's calendar published pursuant to L. Civ R. 78.1(a).

Respectfully, both the plaintiffs and Zurich request that the Court adjourn Zurich's motion to dismiss one cycle, based on the agreement reached between Zurich and Plaintiffs as set forth above. We thank the Court for its consideration of this request.

Very truly yours,



Francis P. Crotty

FPC/lo

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